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NEXTEL®

November 21, 1997

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Room 222
Washington, D.C. 20554

EX PARTE

Re: CC Docket No. 94-102

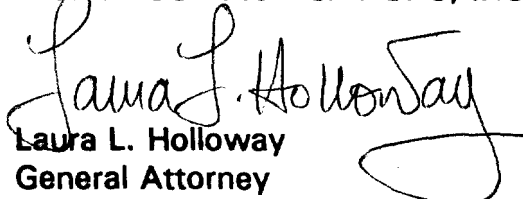
Dear Mr. Caton:

On behalf of Nextel Communications, Inc. ("Nextel") and pursuant to Section 1.1206 of the Federal Communications Commission's Rules, this letter constitutes notice that Lawrence R. Krevor, Laura L. Holloway and Bob Montgomery met yesterday with David Furth, Laura Smith and Jay Jackson of the Commercial Wireless Division of the Wireless Telecommunications Bureau, to discuss issues related to implementing Enhanced 911 ("E911") on Nextel's nationwide all-digital wireless system. The attached is a summary of the issues discussed.

An original and one copy of this letter have been filed with the Secretary pursuant to Section 1.1206. Should any questions arise in connection with this notification, please do not hesitate to contact the undersigned.

Respectfully submitted,

NEXTEL COMMUNICATIONS, INC.


Laura L. Holloway
General Attorney

Attachment

cc: David Furth
Laura Smith
Jay Jackson

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

November 20, 1997

E911 Meeting with David Furth, Laura Smith and Jay Jackson

I. Need for a national funding mechanism

- state by state funding mechanisms will result in delays, billing system obstacles and an inability to provide E911 in those areas where states/localities are not willing to reimburse wireless carriers

- Examples of problems:

- (1) West Virginia PUC Staff has stated in no uncertain terms to wireless carriers that the FCC Order does not require that wireless carriers be compensated for the E911 implementation costs; nonetheless, WVA is imposing a \$.75/sub/month E911 fee on wireless customers
- (2) The state association of PSAPs in Illinois is pushing the legislature for an E911 funding bill that would have the PSAP community collect and disperse all wireless E911 monies
 - the wireless community is seeking collection by an independent third party/board/association that would then disperse those monies to wireless carriers and PSAPs
 - the PSAP organization has threatened wireless carriers orally that the PSAPs will refuse to accept wireless 911 calls, i.e., will refuse to interconnect the wireless system to their PSAP system, if the wireless carriers challenge them on their E911 funding bill
- (3) State of Iowa: there is no statewide funding mechanism, but certain counties are nonetheless pursuing a \$1/subscriber/month surcharge without any reimbursement process for wireless carriers based on the counties' claims that the FCC Order does not require cost reimbursement for wireless carriers

II. Need for federal guidance on technology standards

- cannot allow the PSAPs to dictate the technological standards for E911 interconnection and implementation
- to the extent localities are dictating standards, the FCC should clarify the wireless carriers' legal obligations with regard to providing ANI and P-ANI to the appropriate PSAP, *i.e.*, the carrier is not liable for failure to comply if the wireless carrier's system can deliver the necessary information to the appropriate PSAP
- to the extent PSAPs are requesting ANI and P-ANI (*i.e.*, 20 digits) from the wireless carrier but do not have the technical capability to take all 20 digits, the wireless carrier should not be held accountable for failing to provide E911 service to its customers -- PSAPs cannot be allowed to button-hole carriers into making investments to upgrade the PSAPs systems; the PSAPs are responsible for getting their systems into E911 technical capability

III. "Allcalls" vs. "Validated Calls"

- as long as the FCC leaves the choice to PSAPs, the wireless carriers will be unable to fully comply with every PSAP's request because a Mobile Switching Center is not capable of providing both "all calls" to some PSAPs on the switch and only "validated calls" to other PSAPs on the switch